

1. Debtor identified a Plenary Retail Liquor License in Debtor's Schedule B.62 of its bankruptcy schedules that Debtor values at \$375,000.
2. Trustee intends to sell all of the bankruptcy estate's right, title, and interest in and to the Plenary Retail Liquor License identified in Debtor's Schedule B.62 of its bankruptcy schedules.
3. Jay Miller has experience is selling liquor licenses in Debtor's geographical area of operation. Mr. Miller has over 35 years of diversified real estate and financial experience, and

has coordinated growth and development plans for local, regional and national restaurant companies and retailers, including the sale and purchase of liquor licenses. Mr. Miller has focused on tenant representation, site selection, development, asset dispositions and leasing. In addition, Mr. Miller has successfully represented property owners and developers in both the leasing and disposition of assets ranging from power centers to community and neighborhood centers to freestanding buildings. Mr. Miller joined CBRE, Inc. in 2013, as a Senior Vice President upon the sale of Fameco Real Estate, L.P., the Philadelphia region's leading retail brokerage firm specializing in retail real estate and the shopping center industry. Mr. Miller joined Fameco after its merger with RAS Brokerage in 2005 and was named Partner at Fameco in 2009. Before joining RAS, Mr. Miller was Vice President, Real Estate for American Multi-Cinema, Inc. (AMC Theaters) in New Jersey. Mr. Miller's previous real estate experience includes working as the Vice President, Director of Real Estate for the J. W. O'Connor Group/WellsPark Group in New York City and Boston and as a Regional Leasing Manager for the Cafaro Company in Ohio. Earlier in his career, Mr. Miller was a Senior Asset Manager at EQK Partners and a Senior Tax Consultant with Laventhol & Horwath.

4. Trustee should be authorized to employ Mr. Miller to sell or otherwise dispose of Debtor's ownership interest in the Plenary Retail Liquor License (described in Debtor's Schedule B.62 of its bankruptcy schedules) in the manner that Mr. Miller deems appropriate, subject to Trustee approval, including but not limited to private sales, public auctions, silent auctions, sealed bids, or any other method of sale or disposition.

5. Trustee requires the services of Jay Miller to recover and liquidate the Plenary Retail Liquor License (described in Debtor's Schedule B.62 of its bankruptcy schedules). Mr. Miller has considerable experience in matters of liquidating liquor licenses, and is well qualified to provide these services.

6. Jay Miller does not hold or represent an interest adverse to the bankruptcy estate, is a disinterested person within the meaning of 11 U.S.C. § 101(14), has not served as an examiner and does not represent a creditor in this case. This Application is accompanied by Mr. Miller's Verified Statement setting out Mr. Miller's connection with the debtor, creditors or other parties in interest, their respective attorneys and accountants, and the United States Trustee, and any person employed in the office of the United States Trustee, as required by FED. R. BANKR. P. 2014.

7. Trustee believes that it is in the best interest of the Bankruptcy Estate that he be authorized to employ Jay Miller to recover and liquidate the Plenary Retail Liquor License identified in Debtor's Schedule B.62 of its bankruptcy schedules. Trustee proposes to employ Mr. Miller to sell the personal property for a flat fee of 10%, together with make-ready expenses, including but not limited to expenses for advertising, record searches and verifications, mailing costs, and other expenses that are actual and necessary, subject to Trustee's approval.

8. Trustee will file a separate application for payment of fees and reimbursement of expenses to Jay Miller and request Court approval at such time as is appropriate.

9. The Trustee requests that the Court enter an order approving and authorizing the employment of Jay Miller.

WHEREFORE, the Trustee requests that the Court enter an Order authorizing him to employ Jay Miller of CBRE, Inc. to recover and liquidate the property described above, and for such other and further relief which the Court deems just and equitable.

/s/ Ginger D. Goddard
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE: CB CHATHAM, LLC,) CASE NO. 20-12452 SAH
Debtor(s)) Chapter 7

VERIFIED STATEMENT

Jay Miller of CBRE, Inc. hereby makes this verified statement in compliance with F. R. Bankr. P. 2014(a):

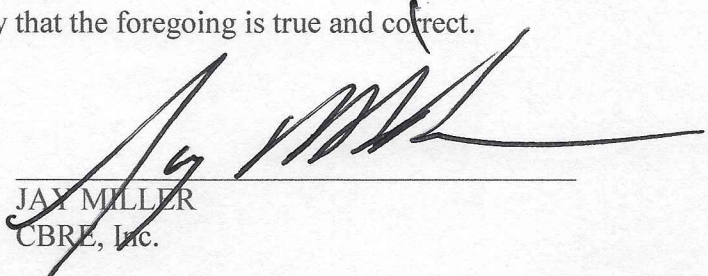
That to the best of my knowledge, information and belief, Jay Miller of CBRE, Inc. has no connection with the debtor, any creditors or other parties in interest in this case, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee that will disqualify him from providing services to the Trustee and the bankruptcy estate.

That to the best of my knowledge, information and belief, Jay Miller of CBRE, Inc. is a disinterested party within the meaning of 11 U.S.C. Section 101(14), and does not have a conflict of interest as to any creditors of this bankruptcy with respect to the matters of the proposed engagement.

That I have read the Application to Approve Employment and am familiar with the terms in the Application and agree to abide by its terms.

I, Jay Miller, verify under penalty of perjury that the foregoing is true and correct.

DATED: 8/13/2020



JAY MILLER
CBRE, Inc.